

D. N. UWY-CV14-6025333-S : SUPERIOR COURT/CLD
ROBIN SHERWOOD, ET AL : J.D. OF WATERBURY
V. : AT WATERBURY
STAMFORD HOSPITAL : NOVEMBER 3, 2016

**OBJECTIONS TO SCHEDULE A
ATTACHED TO NOTICE OF DEPOSITION OF RICHARD BERCIK, M.D.**

1) A complete copy of your original treatment record including any consultation reports, records received from other health care providers pertaining to Robin Sherwood, telephone records, radiology reports, and other notes or documentation reflecting treatment of Robin Sherwood;

OBJECTION: Plaintiffs object to this request on the grounds that it is unduly burdensome since the records are kept electronically. Notwithstanding the above, Plaintiffs have produced all records they have obtained from Dr. Bercik's office, including pelvic floor therapy notes, and Dr. Bercik's entire expert file.

3) any medical literature/case studies reviewed or consulted in the course of your treatment of Robin Sherwood;

OBJECTION: Plaintiffs object to this request on the grounds that it is unduly burdensome. Notwithstanding the above, Plaintiffs have produced all Dr. Bercik's entire expert file including medical literature he relied upon for his opinions in this matter.

4) a list of cases in which you've testified in pelvic mesh litigation cases either as a treating physician or as a retained expert witness;.

OBJECTION: Plaintiffs object to this request on the grounds that it is unduly burdensome since Dr. Bercik does not keep a list of cases.

CERTIFICATION

This is to certify that a copy of the foregoing was Emailed this date, to all counsel of record.

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/s/ Jacqueline E. Fusco

Jacqueline E. Fusco, Esq.